

October 17, 2003

Dear FCC,

Ref: RM-10805, RM-10806, RM-10807, RM-10808, RM-10809, RM-10810, RM-10811, and My Previous Comments of September 8, 2003

Again the short answer, if you wish to read no further, is to eliminate all Element 1 requirements from Part 97 of the FCC Rules and Regulations. This is not consistent with the above mentioned RM's as it was with RM-10781 to RM-10787, but elimination would be the most desirable outcome for the Amateur Radio Service.

The longer answer is mired in the details. Again my preferences are in the details and do not align with any of the proposals. Should the details in any of these proposals be cause to delay the removal of the code requirement, I, again, urge you to follow the requests found in RM-10785, RM-10786 and RM-10787, to expedite this area of the proposed rulemaking and deal with the other issues, in a prudent manner, at a later date.

Additional Comments:

1. Should any of the **zealot** "*old timers*" be unfamiliar with the actual complexity or competence of operating CW, or copying high speed CW, these days I would like to note that it took me all of 30 minutes to "learn" to copy 15+ wpm. All that was required was an internet search (< 15 minutes) for some CW software – another 5 minutes to down load (all I have is dial up !!), another 5 minutes to transfer to my rig computer and install and 5 minutes to get familiar with the program and configure for "higher speed" copy. Some additional time was spent looking for a few CW signals, which copied quite well, even in the mud! Oh yes, I forgot to mention that I have not significantly operated CW since my Sophomore year in High School when I was a Novice (for those of you not wanting to search out my previous comments, that was 1957 !) I did not try to transmit or doubt the ability of the program to produce a "perfect" fist, as the timing would be solely determined by the program and my computer (not to really omit any credit to my commercial manufacturer(s) of the keyer in the rig(s) which are phenomenal, but remain unused ! I have to admit I do use a straight key for some antenna tuning applications, at very low power.).
2. As all of the above batch of referenced RM's proposes to retain Element 1 in some fashion, I am opposed to all. However if the FCC decides to retain a CW requirement in any form, I would strongly recommend that testing be allowed with "any means available" to copy and transmit the code. In other words, if the applicant wishes to bring a laptop computer, a Palm Pilot or other equipment capable of decoding and/or encoding the code consistent

with the state of the industry, these assisted methods would be allowed. If an applicant wished to stroke their ego, they would also be permitted to test with out any assistance.

3. In addition if the code requirement is retained in any form, I suggest that an additional test be added to the Extra class exam to **demonstrate** proficiency in at least one digital mode (not including CW), using "any means available" to copy and transmit in that mode. I also think all Extra class license holders should be retested to demonstrate said proficiency to retain their privileges.
4. I previously stated that three classes would be adequate, call them what you will. The entry class should have band edge restrictions (~ 4 to 6KHz) and power limitations – say 50 (+/-) watts on all bands (same basic frequencies as General) and permitted to use all emissions, but be restricted to commercially manufactured (transmitting) equipment or kits. The General or "middle" class would have privileges similar to the current Advanced class with a power limit of 100 – 120 watts, unless the operator built their own larger Power Amplifier to the limit of the existing regulations (let's demonstrate some hobby / technical skills if you want higher power). Note: Higher power is not usually necessary if there is an appropriate understanding of antennas, transmission lines and their application. The Extra class would get all frequency privileges but the same power restrictions as General unless they also built their own amplifier.
5. I think the continual improvement of the technical content required in the tests for General and Extra has merit. The object of testing, however, should not be to place an unnecessary, unrealistic or egotistical bars on those interested individuals from *entering* Amateur Radio, but to reward those who can demonstrate increased skill levels in many areas of the hobby. The testing objective must also assure all candidates, at all levels, are capable of proper operation and etiquette at the tested level.

Respectfully submitted.

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